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11 *Attorneys for Defendant Ronald Craig Ilg*

12
13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF WASHINGTON

15 UNITED STATES OF AMERICA,

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17 Plaintiff,

18
19 vs.

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21 RONALD CRAIG ILG,

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23 Defendant.

Case No. 2:21-cr-00049-WFN

**DECLARATION OF ANDREW M.
WAGLEY IN SUPPORT OF
UNOPPOSED MOTION TO
CONTINUE TRIAL DATE AND
ASSOCIATED PRETRIAL
DEADLINES**

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26 I, Andrew M. Wagley, do hereby declare as follows:

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28 1. I am over the age of eighteen, competent to testify to the matters
29 stated herein, and make this Declaration based upon my own
30 personal knowledge.
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- 1 2. I am one of the attorneys of record for the Defendant, Ronald C. Ilg
2 (“Dr. Ilg”). I make this Declaration in Support of Defendant’s
3 Unopposed Motion to Continue Trial Date and Associated Pretrial
4 Deadlines.
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- 7 3. As indicated in the accompanying Unopposed Motion, a continuance
8 is warranted based upon the complex nature of this matter and the
9 need for counsel to adequately prepare for trial. This is a complex
10 matter involving a multitude of discovery regarding the dark web,
11 cryptocurrency, and the forensic analysis of various electronic
12 devices allegedly associated with the Defendant and witnesses.
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- 15 4. To date, the United States had produced three batches of discovery,
16 which includes hundreds of pages of documents, multiple media
17 (including witness interviews) and native files, various search
18 warrants, and multiple cell phone extractions. At this juncture, the
19 defense needs more time to analyze this discovery and pursue expert
20 witnesses in various areas as applicable.
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- 23 5. Defense counsel has been diligently reviewing discovery and
24 analyzing various pretrial motions. However, more time is needed to
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1 finish analyzing discovery, obtain expert witnesses, interview lay
2 witnesses, and adequately prepare for trial.

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5 6. Defense counsel would not have a sufficient amount of time
6 reasonably necessary for effective preparation if a continuance is not
7 granted. Furthermore, complex aspects of this case involving the
8 dark web and cryptocurrency will likely present various novel
9 questions of law in relation to pretrial motions.

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14 7. The Defendant, Dr. Ilg, is in support of this continuance request in
15 order to prepare his case for trial. This Motion is accompanied by an
16 executed Waiver of Speedy Trial.

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19 8. Prior to the filing of this Motion, I have corresponded with Assistant
20 United States Attorney (“AUSA”) Richard Barker regarding this
21 continuance request. AUSA Barker indicated that he has no
22 opposition to this continuance request.

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26 9. The parties have agreed upon a new trial date in March 2022. The
27 parties have also agreed upon the continuance of pretrial deadlines to
28 correspond with this new trial date.

1 10. This continuance request is brought in good faith and not for the
2
3 purposes of hindering or delaying this matter.
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5 I hereby declare the foregoing is true and correct under penalty of perjury
6
7 of the laws of the State of Washington and the United States.

8 EXECUTED this 10th day of September, 2021 in Spokane, Washington.
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11 By: /s/ Andrew M. Wagley
12 Andrew M. Wagley
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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of September, 2021, I electronically filed the forgoing document with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the attorneys of record in this matter.

EXECUTED in Spokane, Washington on September 10, 2021.

By: /s/ Jodi Dineen
Jodi Dineen, Paralegal